

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

HO WAN KWOK,

a/k/a “Miles Guo,”

a/k/a “Miles Kwok,”

a/k/a “Guo Wengui,”

a/k/a “Brother Seven,”

a/k/a “The Principal,”

KIN MING JE,

a/k/a “William Je,”

and

YANPING WANG,

a/k/a “Yvette,”

Case No. 1:23-cr-00118-AT

**MOTION TO ASSERT VICTIM RIGHTS UNDER THE CRIME VICTIMS’
RIGHTS ACT (CVRA)**

I, Wei Wang, pro se, respectfully submit this motion to the Court pursuant to the Crime Victims’ Rights Act (CVRA), 18 U.S.C. § 3771, to assert my rights as a victim in the above-captioned case.

I respectfully apologize to this Court for any mistakes in my English or legal documents. English is not my first language, and I am doing my best to communicate clearly. I ask the Court to please excuse any errors in my writing or formatting.

I invested over \$150,000 in the G-Series entities initiated by Miles Guo to support his establishment of the New Federal State of China and the Whistleblower Movement to take down the Chinese Communist Party

(CCP). Following Miles Guo's conviction by a jury, I have become a victim as defined under the law.

After Miles Guo's incarceration, the Himalaya Alliance (the "Alliance") became the sole channel for G-Series investors like myself to receive updates on Miles Guo's case and transmission of information regard Miles Guo. For a significant period, the Alliance consistently propagated to all G-Series investors that Miles Guo was wrongfully imprisoned due to a conspiracy involving a CCP-corrupted U.S. Department of Justice, U.S. courts, and CCP agents allegedly embedded within the Alliance. Believing this narrative, I steadfastly maintained that by persistently sharing anti-CCP messages on social media- through my X account @ccp_terminator_—I could contribute to the anti-CCP cause and help secure Miles Guo's release.

Despite noticing certain opaque and non-transparent management practices within the Alliance that raised concerns, I chose to remain tolerant overall, motivated by a desire to preserve the Alliance's unity in advancing the anti-CCP mission.

However, my resolve began to waver recently due to the prolonged delay in Miles Guo's sentencing and my review of a series of pro se motions filed by a neutral individual from mainland China, Chunk Chyi [Doc. 505, Doc. 507, Doc. 508]. These developments have shaken my previous convictions and led me to seriously question whether the CCP's infiltration and sabotage of the Alliance may far exceed what I had initially believed. Furthermore, I have been inexplicably excluded from a recent series of refund application processes initiated by the Alliance. It feels as though these matters are entirely disconnected from me, despite my status as an investor. My most basic right to be informed as an investor has been stripped away.

Under the CVRA, I respectfully assert through this motion that my interests as a victim have not been adequately represented, communicated, or disclosed by the current victims' committee. I urge the Court to intervene and halt any ongoing refund claims that may be unlawful or improper, recognizing that a significant number of investors in circumstances similar to mine have not been effectively represented. I request that the Court facilitate the establishment of a new victims'

committee that operates with greater efficiency, transparency, and strict adherence to applicable U.S. laws and regulations.

Until such measures are in place, I strongly oppose any attempts to distribute or allocate my investment funds without my knowledge or consent, and I reserve the right to pursue legal action against any such conduct.

Relief Requested: Acknowledge my status as a victim under the CVRA in Case 1:23-cr-00118-AT.

1. Order a review of the current victims' committee and its representation of G-Series investors.
2. Suspend any ongoing refund or asset distribution processes that fail to adequately inform or include all affected investors, pending further investigation.
3. Facilitate the creation of a new, transparent, and lawful victims' committee to ensure fair representation of all victims, including myself.

Declaration:

I, Wei Wang, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Respectfully submitted,

Wei Wang



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